

**N THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MICHAEL BRANDON CLEMENT,

Plaintiff

v.

IHEARTMEDIA INC.,

Defendant.

Case No. 5:24-cv-581-OLG

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

iHeartMedia Inc., Defendant herein, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer, or otherwise respond to Plaintiff's Complaint. In support of their Motion, Defendants state as follows:

1. On May 29, 2024, Plaintiff filed its Complaint alleging copyright infringement against iHeartMedia Inc.
2. On August 9, 2024, Defendant iHeartMedia Inc., was served with Plaintiff's Complaint. The current deadline for defendant to answer is August 30, 2024.
3. On August 20, 2024, counsel for Defendant and counsel for Plaintiff met and conferred and has agreed to a 30-day extension of time for defendant to answer or otherwise plead by September 30, 2024.

WHEREFORE, Defendant iHeartMedia Inc., respectfully request that the time in which they are required to move, answer, or otherwise respond to Plaintiff's complaint for copyright infringement be extended up to and including September 30, 2024.

Date: August 23, 2024

Respectfully submitted:

By: /s/ Jeffrey J. Phillips

Jeffrey J. Phillips

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***Attorney for Defendant iHeartMedia
Inc.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 23 day of August, 2024.

/s/ Jeffrey J. Phillips

Jeffrey J. Phillips

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendant met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Jeffrey J. Phillips

Jeffrey J. Phillips